



COUNTY OF SAN DIEGO  
AIR POLLUTION CONTROL DISTRICT

AIR POLLUTION CONTROL  
BOARD

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**DATE:** May 14, 2008

**TO:** San Diego County Air Pollution Control Board

**SUBJECT:** AMENDMENTS OF RULE 67.21 – ADHESIVE MATERIAL APPLICATION OPERATIONS (District: All)

**SUMMARY:**

**Overview**

Proposed amendments to Rule 67.21 will reduce volatile organic compound content limits for some architectural and specialty adhesive materials, and will also provide clarifications and updates. If implemented, amended Rule 67.21 is expected to reduce volatile organic compound emissions from adhesive material application operations by approximately 390 tons per year (31%) with no additional costs for affected businesses. The proposed amendments to Rule 67.21 are necessary to comply with State law, which requires adoption of all feasible control measures to reduce emissions of ozone precursors.

The Air Pollution Control Board is requested to adopt proposed amendments to Rule 67.21 – Adhesive Material Application Operations. Rule 67.21 regulates emissions of volatile organic compounds from the application of adhesives, sealants, and adhesive and sealant primers. Volatile organic compounds contribute to ozone (smog) formation and can be toxic.

**Recommendation(s)**

**AIR POLLUTION CONTROL OFFICER**

1. Find that it is certain there is no possibility that amending Rule 67.21 may have a significant adverse effect on the environment, and that this action is exempt from the provisions of California Environmental Quality Act (CEQA) pursuant to California Code of Regulations, Title 14, Section 15061(b)(3).
2. Adopt a resolution titled Resolution Amending Rule 67.21 of Regulation IV of the Rules and Regulations of the San Diego County Air Pollution Control District.

**SUBJECT: AMENDMENTS OF RULE 67.21 – ADHESIVE MATERIAL APPLICATION OPERATIONS**

**Fiscal Impact**

The recommended amendments to Rule 67.21 will not have a significant fiscal impact on the Air Pollution Control District. The amended rule will be enforced with existing District staff, and full-cost recovery is anticipated through the San Diego County Air Pollution Control District's Permit Program.

**Business Impact Statement**

All types of adhesive materials complying with the proposed new limits on volatile organic compound content are readily available from manufacturers, distributors, and local retail stores. Their cost is equal or less than adhesives with a higher volatile organic compound content thus, amending Rule 67.21 will not adversely impact the business community.

**Advisory Board Statement**

There was no quorum at the March 12, 2008 meeting of the District Advisory Committee. Members present recommended adopting the proposed amendments to Rule 67.21.

**BACKGROUND:**

Rule 67.21 was first adopted in 1998. Since then, the adhesive and sealant manufacturing industry has focused on further reducing volatile organic compound (VOC) content in adhesive materials. Consequently, lower-emitting adhesive materials are now readily available in the marketplace. Associated amendments to Rule 67.21 are necessary to fulfill the State requirement to adopt all feasible control measures to reduce air pollution. San Diego County does not yet meet State and federal air quality standards for ozone. This action is a feasible control measure that will contribute toward meeting requirements.

The proposed amendments will reduce VOC content limits for flooring adhesives, multipurpose construction adhesives, contact adhesives, and some adhesives applied on porous materials such as wood. The amendments will also clarify that facilities may annually use less than 55 gallons of non-compliant adhesive materials, but that this low-use exemption does not apply to the associated clean-up, stripping, surface preparation solvents, or adhesive bonding agents. In addition, the amendments will exempt aerosol adhesives that are currently regulated under the California Air Resources Board Consumer Products regulation. The amendments also include several new definitions and updated test methods.

On November 5, 2007, the San Diego County Air Pollution Control District held a public workshop to discuss and receive comments on the proposed amended rule. No significant issues were raised.

**Compliance with Board Policy on Adopting New Rules**

On February 2, 1993 (APCB #2), the Board directed that, with the exception of a regulation requested by business or a regulation for which a socioeconomic impact assessment is not required, no new or revised regulation shall be implemented unless specifically required by

**SUBJECT: AMENDMENTS OF RULE 67.21 – ADHESIVE MATERIAL APPLICATION OPERATIONS**

federal or State law. Proposed amendments to Rule 67.21 are required by State law, which calls for adoption of every feasible control measure to accelerate progress toward achieving ambient air quality standards for ozone. Therefore, implementation of the proposed amendments is consistent with the Board's directive.

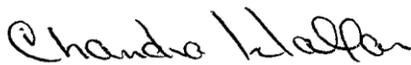
**Environmental Statement**

It can be seen with certainty that there is no possibility that amending Rule 67.21 may have a significant adverse impact on the environment. This action is exempt from the California Environmental Quality Act (CEQA) pursuant to California Code of Regulations, Title 14, Section 15061(b)(3).

**Linkage to the County of San Diego's Strategic Plan**

The County's five-year strategic plan includes an Environment Initiative to ensure environmental preservation and enhance quality of life. Amended Rule 67.21 will provide a significant reduction of VOC emissions. The amendments will not negatively affect the local business community because all types of adhesive materials complying with the proposed new limits are readily available in the marketplace. The amended rule appropriately balances air quality preservation, public health protection, and economic development needs.

Respectfully submitted,



CHANDRA L. WALLAR  
Deputy Chief Administrative Officer



ROBERT KARD  
Air Pollution Control Officer

**ATTACHMENTS**

- Attachment A – Resolution Amending Rule 67.21 of Regulation IV of the Rules and Regulations of the San Diego County Air Pollution Control District
- Attachment B – Change Copy – Rule 67.21
- Attachment C – Socioeconomic Impact Assessment
- Attachment D – Comparative Analysis
- Attachment E – Incremental Cost-Effectiveness Analysis
- Attachment F – Workshop Report

**SUBJECT:** AMENDMENTS OF RULE 67.21 – ADHESIVE MATERIAL APPLICATION OPERATIONS

**AGENDA ITEM INFORMATION SHEET**

**CONCURRENCE(S)**

<b>COUNTY COUNSEL REVIEW</b>	<input checked="" type="checkbox"/> Yes	
Written disclosure per County Charter §1000.1 required?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>GROUP/AGENCY FINANCE DIRECTOR</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A
<b>CHIEF FINANCIAL OFFICER</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A
Requires Four Votes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>GROUP/AGENCY INFORMATION TECHNOLOGY DIRECTOR</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A
<b>COUNTY TECHNOLOGY OFFICE</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A
<b>DEPARTMENT OF HUMAN RESOURCES</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A

**Other Concurrence(s):** N/A

**ORIGINATING DEPARTMENT:** Air Pollution Control District, County of San Diego

**CONTACT PERSON(S):**

Rosa M. Abreu  
Name  
(858) 586-2700  
Phone  
(858) 586-2701  
Fax  
O-176  
Mail Station  
Rosa.Abreu@sdcounty.ca.gov  
E-mail

**AUTHORIZED REPRESENTATIVE:**

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Rosa M. Abreu  
Assistant Director, Air Pollution Control District

**SUBJECT:** AMENDMENTS OF RULE 67.21 – ADHESIVE MATERIAL APPLICATION OPERATIONS

**AGENDA ITEM INFORMATION SHEET**  
(continued)

**PREVIOUS RELEVANT BOARD ACTIONS:**

December 16, 1998 (APCB #1), Adoption of New Rule 67.21 – Adhesive Material Application Operations; February 2, 1993 (APCB #2), Delayed implementation of new or revised regulations unless requested by business, specifically ordered by federal or State law, or for which a socioeconomic impact assessment is not required.

**BOARD POLICIES APPLICABLE:**

N/A

**BOARD POLICY STATEMENTS:**

N/A

**CONTRACT AND/OR REQUISITION NUMBER(S):**

N/A